

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN (Detroit)**

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In re:  
Joanne E. Ackerman

Debtor.

Chapter 7 No. 18-51298-pjs

Hon. Phillip J. Shefferly

**CREDITOR'S RESPONSE TO CHAPTER 7 TRUSTEE'S APPLICATION TO  
RETAIN BK GLOBAL REAL ESTATE SERVICES AND REMAX CROSSROADS  
III TO PROCURE CONSENTED PUBLIC SALE  
PURSUANT TO 11 U.S.C. §§ 327, 328 AND 330**

NOW COMES Nationstar Mortgage LLC d/b/a Mr. Cooper, by and through its attorneys, Trott Law, P.C., and hereby responds to Chapter 7 Trustee's Application to Retain BK Global Real Estate Services and Remax Crossroads III to Procure Consented Public Sale Pursuant to 11 U.S.C. §§327, 328 and 330 as follows:

1. That Creditor is holder of a mortgage on real property owned by the Debtor and located at 630 E. 3<sup>rd</sup> St., Monroe, MI 48161;
2. That the Chapter 7 Trustee filed this Motion on May 21, 2019, to which Creditor is now responding;
3. The Chapter Trustee's Motion seeks consent to market and sell the subject property and compensate BK Global Real Estate Services and Remax Crossroads III;
4. Creditor requests confirmation that if a successful purchaser is found the Chapter 7 Trustee will file a separate motion for approval to sell the subject property which discloses the purchase amount;
5. Creditor requests confirmation that the Chapter 7 Trustee will obtain current and unexpired payoff figures, from the Creditor, prior to closing;
6. Creditor requests confirmation that the Creditor will be paid in full at closing;

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7. Creditor objects to any proposed short sale of the property and further states that any short sale of the payoff amount is subject to written consent/approval of Nationstar Mortgage LLC d/b/a Mr. Cooper;

8. Creditor requests that any Order approving this Motion provide a closing date;

9. Creditor requests that any Order approving this Motion expire ninety (90) days after entry;

WHEREFORE, Creditor prays that any Order entered pursuant to Chapter 7 Trustee's Application to Retain BK Global Real Estate Services and Remax Crossroads III to Procure Consented Public Sale Pursuant to 11 U.S.C. §§327, 328 and 330 be AMENDED to include the above provisions and for whatever fair and equitable relief this Court may so order.

Respectfully Submitted,

TROTT LAW, P.C.

Dated: June 3, 2019

/s/ Crystal L. Price  
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